

Compliance Assurance Monitoring (CAM)
Indicator Parameter(s) and Range(s)
No. 3 Recovery Furnace
BACT PM Emission Limitation (0.025 gr/dscf)

Title V Operating Permit No. TV-2440-0005, Condition 07.6, requires establishing CAM indicator parameter(s) and accompanying indicator range(s) to assure reasonable compliance with the BACT emission limitation for Particulate Matter (PM) from the No. 3 Recovery Furnace (0.025 gr/dscf @ 8% O₂). The CAM indicator parameter(s) and indicator range(s) are to be derived from data demonstrating compliance with the BACT emission limit.

Bowater has selected 6-minute opacity as the CAM indicator parameter. The most recent compliance test, conducted on July 30, 2008, has been selected for review and establishment of the CAM indicator range. A summary of the relevant information from this test is provided in Attachment A.

The average PM concentration measured during the compliance test was 0.018 gr/dscf @ 8% O₂, and the corresponding average 6-minute opacity measured over the test period was 13%. The BACT emission limit is 0.025 gr/dscf @ 8% O₂, yielding an equivalent 6-minute opacity of 18% ($13\% \times \{0.025 \div 0.018\}$). EPA recommends a compliance margin of 10 percent when determining CAM indicator ranges. Applying the EPA recommended 10% compliance margin (i.e., 90 % of the emission limit) to the 13% opacity during the test yields a CAM indicator range of 16% opacity ($13\% \times \{[0.025 \times 0.90] \div 0.018\}$).

This information is derived from an approved source test for PM conducted on July 30, 2008. Bowater believes this to be the most representative of current operations. Therefore, Bowater requests the six-minute opacity of 16% as the CAM indicator range, averaged over a three-hour block average, the same period as the compliance test upon which it is based.